

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket No. 94-102
to Ensure Compatibility with Enhanced)	
E911 Emergency Calling Systems)	
)	

To: The Commission

**Carrier Report of Lamar County Cellular, Inc. Regarding
Implementation of Wireless E911 Phase II Automatic Location Identification**

Lamar County Cellular, Inc. ("Lamar County") hereby submits a report regarding implementation of wireless E911 Phase II Automatic Location Identification ("ALI"), in compliance with the Federal Communications Commission's ("FCC" or "Commission") Further Memorandum Opinion and Order in the above-captioned proceeding.

I. Background / Contact Information

Lamar County serves rural Texas and its contact information is as follows:

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Manager

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II. E911 Phase II Location Technology Information

Lamar County has yet to choose a solution for its Phase II ALI technology. Lamar County remains undecided at this point due to its concern about general handset availability in time to meet the FCC's rules and the lack of pricing information for network-based solutions. As a result, Lamar County has so far been unable to adequately compare the various Phase II solutions in order to commit to a selection. Lamar County is searching for a product that is available and is proven to work within the time frame necessary for Lamar County to achieve Phase II implementation in compliance with the

Commission's rules.¹ Whichever technology Lamar County selects, it intends to deploy it throughout its service area.

III. Testing and Verification

Lamar County has yet to test any ALI solutions since it is still examining available products. In addition, Lamar County has not been able to test any handsets since none are available and Lamar County has yet to be given a date when ALI-capable handsets will be available. Lamar County anticipates using a combination of Empirical Testing Methods and Predictive Testing Methods to gauge the accuracy of the technology it eventually chooses.

IV. Implementation Details and Schedule

While Lamar County is awaiting product availability from handset vendors, it has developed a tentative implementation schedule to meet the FCC's handset-based rules and, if necessary, network-based rules. Lamar County will make its technology choice by the first quarter of 2001. If Lamar County chooses a handset solution, it will begin selling ALI-capable handsets on October 1, 2001 as the FCC's rules require. Lamar County will continue to evaluate network-based ALI solutions and, if it chooses a network solution, intends to select and deploy a technology after the first quarter of 2001, once it has made its choice. Lamar County will accelerate this schedule to the extent necessary upon receipt of a PSAP request.

V. PSAP Interface

Lamar County has yet to receive a Phase II PSAP request.² Most of the PSAP interface details will depend upon the technology Lamar County chooses and the specific requests of the PSAP.

VI. Handset Information

If Lamar County decides to pursue a handset-based solution, it will run promotions in order to replace existing handsets. The price of the new ALI-capable handsets, unavailable at this time, will affect Lamar County's replacement strategy.

¹ Lamar County has been researching many different Phase II vendors and their potential product offerings. These companies include Nortel, Snap Track, SCC Communications, Technocom Corporation, GTE Telecommunications Services, Cell-Loc, True Position, US Wireless, and SigmaOne Communications Corporation.

² In general, the following hardware and software is needed to transmit Phase II data to PSAPs: IS41C – Dialed Number Trigger, E911 Software, MPC – Mobile Positioning Center, PDE – Position Determining Entity, and receivers at each cell site.

VII. Other Information

Lamar County notes that the remote and rural nature of its service territory in Texas can present additional and unforeseen problems when installing and testing location technology. Lamar County would have a much better handle on how it will eventually implement its Phase II plan if the vendor products were available for testing. Unfortunately, Lamar County's Phase II implementation plan depends, in large part, upon the schedules and plans of the vendors.

November 9, 2000